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February 5, 2019

Honorable James L. Garrity, Jr.  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

**Re: Penny Ann Bradley, Chapter 11, Case No. 18-10122(JLG)**

Hon. Judge Garrity:

This letter is written to update the Court of the status of the above-referenced Chapter 11 case.

The Debtor's last status letter was filed with the Court on December 30, 2019 [Docket No. 224]. Additionally, on January 3, 2020, Special Counsel filed an additional letter with the Court [Docket No. 227] to request an adjournment of the following matters, which had been scheduled for January 8, 2020: (i) the Case Status Conference, (ii) the NSM Motion, (iii) the Berman Motion, (iv) the Atlas Claim Objection, (v) the Pollack Claim Objection, and (vi) the UST Motion. By a Memorandum Endorsed Order dated January 8, 2020 [Docket No. 231], the aforementioned matters were adjourned until February 12, 2020 at 10:00 a.m.

The Debtor has forwarded a Stipulation resolving claims related to the Berman Motion, the largest creditor of the estate. The Debtor is waiting on comments from Berman on the Stipulation and will hopefully have the Stipulation signed in the next week. Once that Stipulation is signed, the Debtor anticipates the filing of a motion pursuant to Bankruptcy Rule 9019.

The Debtor continues to negotiate in good faith to resolve all claims. The Debtor has been in communications with the U.S. Trustee with regard to discovery relating to the UST Motion. The U.S. Trustee turned over its discovery, which the Debtor is reviewing and may possibly incorporate into a proposed discovery plan with regard to the UST Motion. The Debtor is optimistic that it will resolve some or all of the claims very shortly and will provide the Court with any further updates at, or prior to, the next Status Conference, should there be any significant progress.

Based on discussions with the U.S. Trustee, the Debtor will be seeking an adjournment of all matters scheduled for February 12, 2020, with the exception of the Atlas Claim Objection [*see* Letter from Joseph Maniscalco, dated February 5, 2020, Docket No. 237] and the U.S. Trustee consents to such request. Indeed, the U.S. Trustee believes the Berman Stipulation should be signed and filed with the Court before other matters proceed.

With regard to various administrative issues, please note the following:

- The Debtor is current with Monthly Operating Reports through November 2019 and anticipates the filing of her December 2019 Monthly Operating Report prior to the scheduled Status Conference. The Debtor is in the process of reviewing her previously filed Monthly Operating Reports with her accountant to determine whether certain Monthly Operating Reports will need to be amended.
- The Debtor's records indicate that she is current with U.S. Trustee Quarterly fees and is fully compliant with all administrative obligations under the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and United States Trustee Guidelines.

If the Court wishes, I will be pleased to submit any further status updates at such times as the Court may direct.

Respectfully,  
*/s/ Daniel S. Alter*  
Daniel S. Alter, Counsel for the Debtor

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